

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
vs.
DONNELL RUSSELL,
Defendant.

No. 20-cr-538 (PGG)

DEFENDANT RUSSELL'S PROPOSED *VOIR DIRE* QUESTIONS

Defendant Donnell Russell, through counsel, and pursuant to Rule 23 of the Federal Rules of Criminal Procedure, submits the following questions that he respectfully requests the Court to include in its examination of prospective jurors in addition to those submitted by the government.

Defendant has also filed a motion in *limine* to employ a juror questionnaire, which includes his proposed questionnaire. Many of the following questions are also contained in that proposed questionnaire.

Mr. Russell respectfully reserves the right to make supplemental proposals to question prospective jurors and to his proposed questionnaire as well as to object to proposed questions submitted by the government.

/s/ Michael G. Freedman
THE FREEDMAN FIRM PC
800 Wilshire Blvd., Suite 1050
Los Angeles, CA 90017
Telephone: (213) 816-1700
Facsimile: (213) 816-1706
E-Mail: michael@thefreedmanfirm.com

Have you or anyone you know ever been the recipient of a threat? If so, please describe?

Have you or anyone you know ever been accused of making a threat? If so, please describe?

Are you familiar with R. Kelly, otherwise known as Robert Sylvester Kelly?

If so, do you have any opinion about R. Kelly? Please describe.

Do you have any opinion about R. Kelly that would prevent you from being fair and impartial in this case if this case involves or references R. Kelly? If so, please describe.

Have you watched any shows or movies about R. Kelly? If so, please describe.

Have you heard of the documentary Surviving R. Kelly?

Have you seen the documentary Surviving R. Kelly?

Do you know anyone who has seen the documentary Surviving R. Kelly?

Have you read online about R. Kelly? If so, what have you read?

This case involves allegations related to an individual who is known publicly as a result of his profession in the music and entertainment business. Do you have any views or feelings about serving as a juror in a case where the defendant that has been accused of criminal conduct can be described as a celebrity or public figure? If so, what are those views?

Have you or a friend or family member ever been accused of sexual harassment, sexual abuse, or sexual assault? Would that prevent you from being fair and impartial in this case?

Have you or a friend or family member ever been the victim of sexual harassment,

sexual abuse, or sexual assault? Would that prevent you from being fair and impartial in this case?